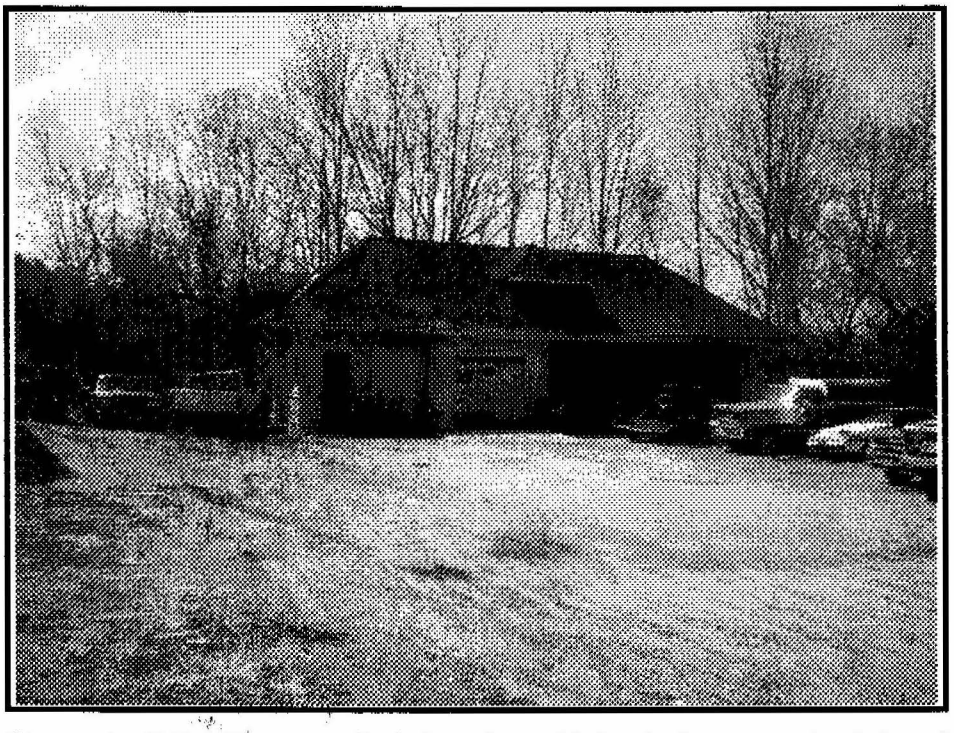
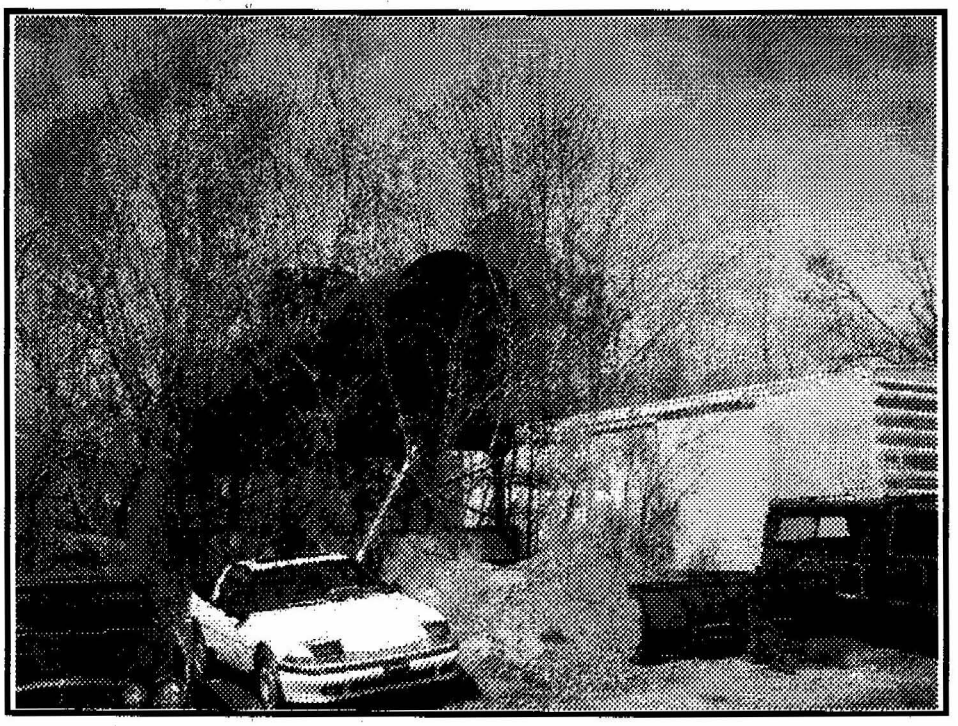
3. Garage building.

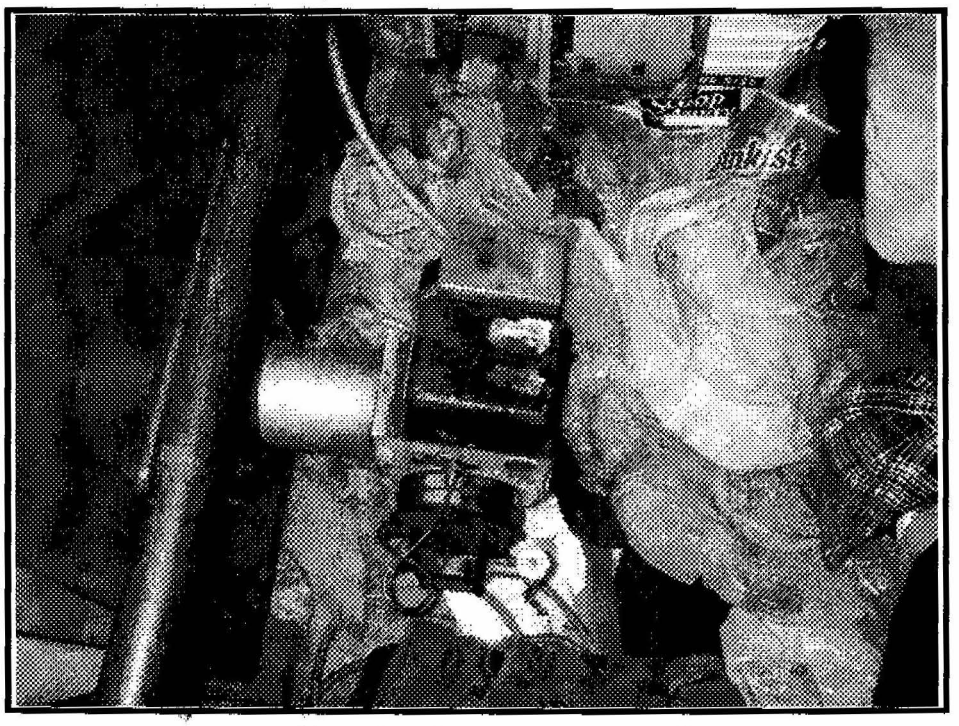


4. Storage building/former railroad station with junked autos to the left and right.

5. Boxcar used for storage of used transmissions.



6. 10,000 gallon aboveground storage tank (former rail car).



7. Oil burner in warehouse building.

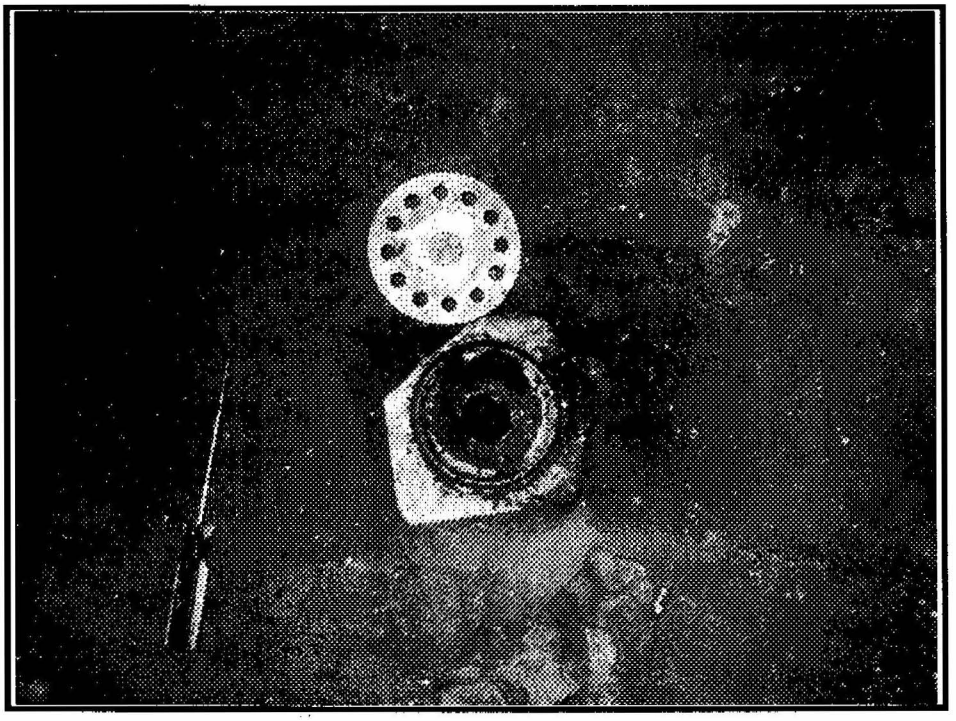
8. Heating oil AST in garage.

9. Transmissions in storage building (former train station).

10. Used transmissions stored in warehouse building.

11. Transmissions and soil staining at SS-1 sample location. The in-ground scale is to the right.

12. Floor staining in the garage building.



13. Floor drain in garage building.

14. Barrels observed on the adjoining site to the east.

APPENDIX 3

RESOURCE INFORMATION

REGULATORY CONTACTS, PERSONS INTERVIEWED, AND HISTORICAL SOURCES

SOURCE	INFORMATION/CONTACT
Environmental Data Resources, Inc. (EDR)	Regulatory Database Search Radius Map with GeoCheck® April 26, 2004
Sanborn Fire Insurance Maps	1922, 1934, 1944 – EDR
City Directories	1967, 1971, 1978, 1982, 1984, 1990, 1996, 2000 – Maine Historical Society
Aerial Photographs	1940, 1964, 1975, 1998 – USDA Cumberland County, Maine
Other Sources	Mr. Joseph Kittrell, owner Mr. Denis Dancoes, real estate agent Windham Historical Society Windham Assessor's Office Mr. Roger Timmons, Code Enforcement Officer Mr. Charles Hammond, Windham Fire Chief Portland Water District

APPENDIX 4

ASSESSOR QUALIFICATIONS

Aaron R. Martin, B.S.
Environmental Scientist

PROFILE

Aaron Martin recently began his career with Jacques Whitford as an Environmental Scientist. Studying at the Iowa Lakeside Laboratory, in conjunction with The University of Iowa; Aaron worked with his professor and four other students, to complete an wetland delineation project for a parcel of land bordering Lake Okoboji. After graduating from The University of Iowa with a B.S. in Environmental Science he was the environmental science, biology, and chemistry tutor for the student athletes at The University of Iowa. Mr. Martin also served as an intern for the U.S. Fish and Wildlife Service as a Conservation Associate at the Connecticut River Coordinator's (CRC) Office in Sunderland, Massachusetts. As an intern, he assisted the CRC staff coordinating federal, state, and private interests for the cooperative migratory fish restoration program in the Connecticut River Watershed. Aaron has also been a HVAC apprentice for Martin Heating and Cooling, and manager for Martin Oil Wholesale fuel oil in Boone, Iowa.

EDUCATION

The University of Iowa, *Iowa City, IA*
B.S., Environmental Science, 2001

TRAINING AND CERTIFICATION

OSHA 40 Hour Hazardous Materials Operation Training, 2004

CAREER SUMMARY

Jacques Whitford Company Inc., *Portland, ME* *Environmental Scientist*	2004 - Present
U.S. Fish and Wildlife Service, *Sunderland, MA* *Conservation Associate*	2003 - 2004
University of Iowa Student Athletic Services, *Iowa City, IA* *Environmental Science Tutor*	2002

David V. Chapman, C.G.
Geologist

Profile

Mr. Chapman is a hydrogeologist with more than ten years environmental consulting experience in Maine. Mr. Chapman has a bachelor's degree in geology from the University of Maine at Orono and a Master's Degree in environmental engineering from Northeastern University. He currently manages six environmental sampling projects for the Maine DEP. Mr. Chapman has extensive experience assessing and remediating contaminated sites.

Education

Northeastern University
M. S. Environmental Engineering, 1987

University of Maine
B. A. Geology, 1978

Career Summary

Jacques Whitford Company, Portsmouth, NH
Hydrogeologist 1996 - Present

Caswell, Eichler & Hill, Inc., Portsmouth, NH
Hydrogeologist 1992 - 1996

Nobis Engineering, Inc.
Environmental Engineer 1991 - 1992

Acheron, Inc.
Hydrogeologist 1986 - 1991

Training and Certification

40-Hour OSHA Health and Safety Training, 1983
OSHA 8-hour Refresher, Annual
OSHA Supervisor Course,
Asbestos Building Inspector's Course, 2000
Maine-licensed Site Evaluator #293, 1990

D. Todd Coffin, C.G.
Senior Hydrogeologist

Profile

Todd Coffin is a Senior Environmental Geologist with Jacques Whitford and has fifteen years of consulting experience. Todd has managed numerous projects involving the investigation and remediation of contaminated sites. He has performed feasibility studies of remediation alternatives, conducted pilot testing and has designed and implemented full-scale remediation systems. In the mid-1980's, Todd worked for a consulting firm in Houston, Texas where he served as project hydrogeologist for the Koppers Cavalcade Superfund site. Todd returned to New England in 1 987 where he spent two years conducing contaminated site investigations and remediation in the Boston area for such clients as Shell Oil, Boston University, Avco Research Laboratory and several developers.

Education

Purdue University
M.S. Engineering Geology, 1986
Standard Oil/Shell Research Fellow, 1985

Colby College
B.A. Geology, 1983
Geology Department Prize, 1980; Dean's List; Independent Study Honors, 1983; Distinction in Major, 1983; Donald P. Lake Award, 1983.

Career Summary

Jacques Whitford, Inc., *Portland, M* *Senior Environmental Geologist*	1992 - Present
Haley & Aldrich, Inc., *Scarborough, ME* *Senior Environmental Geologist*	1987 - 1992
McBride-Ratcliff & Associates, Inc., *Houston, TX* *Project Hydrogeologist*	1985 - 1987
McClelland Engineers, Inc., *Houston, TX* *Field Geologist*	1984

Registrations

Certified Geologist, *State of Maine, 1992, No. 310*

APPENDIX 5

ENVIRONMENTAL DATA RESOURCES, INC. REPORT

APPENDIX 6

TEST PIT EXCAVATION LOGS

APPENDIX 7

LABORATORY ANALYTICAL REPORTS

PLAN FOR
SELF-IMPLEMENTING CLEANUP OF
PCB REMEDIATION WASTE – PHASE I
7 DEPOT STREET
SOUTH WINDHAM, MAINE

Prepared for:

Renee Lewis
Village at Little Falls, LLC
2 Market Street, 6th Floor
Portland, Maine 04101

Prepared by:

Ransom Environmental Consultants, Inc.
400 Commercial Street, Suite 404
Portland, Maine 04101
(207) 772-2891

Project No. 046016
April 28, 2006

D. Todd Coffin
Maine Certified Geologist No. 310

TABLE OF CONTENTS

1.0 INTRODUCTION

On behalf of Village at Little Falls, LLC, Ransom Environmental Consultants, Inc. (Ransom) has prepared this notification for self-implementation of Polychlorinated Biphenyl (PCB) Remediation Waste identified at the former Keddy Mill, located at 7 Depot Street in South Windham, Maine (the Site). PCB Remediation Waste has been identified both inside the Site Building and at the exterior of the Site. Ms. Renee Lewis, representative of Village at Little Falls, LLC, is authorized to signed the certification statement required by §761.61(a)(3)(E). Her contact information is:

Ms. Renee Lewis
2 Market Street, 6th Floor
Portland, Maine 04101

(207) 772-7219

The certification statement is attached as Appendix A. A Site Location Map is attached as Figure 1.

Based on the characterization activities performed at the Site, Ransom determined that interior building surfaces and soils beneath and exterior to the building are PCB-contaminated. The source of the PCBs identified at portions of the interior of the Site Building originated from:

1. Release(s) of PCB-mineral oil dielectric fluid (PCB-MODF) from electrical equipment located within the mill building;

2. Tracking of PCB-MODF onto surfaces in parts of the Site Building where PCB-MODF oil spills had not necessarily occurred; and

3. PCB-contaminated fuel oil that remains in distribution piping inside the mill building, and in some areas has leaked onto floors and walls from this piping.

PCB-contaminated soils were identified in three areas:

1. In, and adjacent to, a sump located in the basement of the former Melt Building;

2. On the ground floor of the Melt Building where broken concrete flooring has exposed sub-grade soils; and

3. On the ground floor of the Storage and Manufacturing portion of the building where broken concrete flooring has exposed sub-grade soils.

Village at Little Falls, LLC intends to remediate PCB-contaminated concrete floors and walls such that PCB concentrations remaining in concrete and other porous materials are reduced to 1 milligram/kilogram (mg/kg) or less. PCB-contaminated soil beneath and exterior to the Site building will be remediated in accordance with 40 CFR 761.61, and appropriate classification of "Low Occupancy" or "High Occupancy" areas.

PCB clean-up at the Site will be undertaken in three phases, each in accordance with the (United States Environmental Protection Agency's (EPA's) self-implementing procedure under §761.61(a):

Phase I – Building Interior Sludge, Dirt/debris and Oily Materials

The initial phase of PCB mitigation involves clean-up of sludge, dirt/debris and oily materials that have accumulated on floors and walls inside the former mill building. This plan addresses cleanup of sludge, dirt/debris, and oily materials containing PCBs inside the building.

Phase II – Building Interior Porous Surfaces

Following removal of the interior sludge, dirt/debris and oily materials, sampling and testing of porous concrete and wood surfaces will be undertaken to determine additional mitigation requirements. Many of these surfaces are covered with a layer of sludge, dirt/debris or oily materials, thus it is proposed that the sludge, dirt/debris and oily materials are removed and properly disposed prior to sampling of the underlying porous surface. This approach will allow improved visual identification of stained surfaces and permit more representative sampling of the porous material for PCB impacts. A separate plan will be presented that details the supplemental testing and methodology for mitigation of interior porous surfaces.

Phase III – Soils

Preliminary testing has identified PCBs in soils both exterior to and beneath the site building. Due to restricted access, additional sampling and testing of soils will be undertaken following partial demolition of the Site Building. A separate plan will be presented that details the supplemental testing and methodology for mitigation of site soils.

The remediation work proposed in this Plan is being undertaken by Village at Little Falls, LLC in order to initiate Site redevelopment activities which include demolition of the former mill building. To facilitate the remediation of this facility, Ransom and Village at Little Falls, LLC respectfully request that this Plan be reviewed and approved by the EPA by May 28, 2006 (30 days from submittal).

The Maine Department of Environmental Protection (MEDEP) has reviewed and approved a Voluntary Response Action Plan (VRAP) dated June 8, 2005, and has issued a "No Action Assurance Letter" to Village at Little Falls, LLC and Lumas, Inc. (site owner). The VRAP details the Site background, Site investigation findings and the proposed mitigation plan. MEDEP will issue a "Certificate of Closure" following completion of Site mitigation and review of associated documentation.